

United States District Court
Eastern District of New York
United States of America

D/K-

V.
Burudi FAISON
defendant

CR 07-700

Defendants Request for Instructions to Jury

Pursuant to Federal Rules of criminal
Procedure Rule 30(a)(b)(c)(d).

The defendant request that this court
inform the jury of the law specified herein, that
copies of these laws be permitted looked
over during deliberations, AND that any other
instructions that may be necessary throughout
the proceedings.

(A) The definition of A conspiracy as
Accepted by the 2nd cir courts and the
definition of Attempt as Accepted by the 2nd
cir courts.

(1) The essence of conspiracy is the
agreement to commit an illegal act, and the
agreement must be between at least two persons

(2) Attempt to commit a crime comes when a
person had the intent to commit the crime and engaged
in conduct amounting to a substantial step towards

(B) A defendant CANNOT conspire with a confidential informant conviction not possible

(C) Even if a defendant seeks a supplier, attempts to contact supplier, meet supplier, and agree with supplier on price, terms of payment and date and time of proposed delivery time though displaying intent is insufficient in absence of overt act

(D) If defendants plan to possess an illegal substance had only advanced to the stage of meeting with purported suppliers to work out terms of the deal, evidence of a verbal agreement alone without more is insufficient as a matter of law to support a conviction of attempt

(F) To find a person participated in a conspiracy the government must show some element of cooperation beyond mere knowledge

(G) single acts without more are insufficient to link a defendant to a conspiracy

(H) To find that an accused participated in a conspiracy the government must show some evidence of conspirator knowingly and

voluntarily joining or participated in the conspiracy.

The defendant ask this court to submit these instructions to the jury.

Burudi Faison
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